

Statement of Basis

**Permit to Construct No. P-2011.0103
Project ID 62099**

**Jayco Inc Plant #2
Kimberly, Idaho**

Facility ID 083-00097

Final

**December 18, 2018
Tom Burnham, P.E.
Permit Writer**



The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
Btu	British thermal units
CAS No.	Chemical Abstracts Service registry number
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GACT	Generally Available Control Technology
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Jayco Inc Plant #2 (Jayco, Inc.) is a recreational vehicle (RV) manufacturing facility located at Hankins Road, Kimberly, Idaho. The activities at the facility include RV assembly, woodworking operations, lamination, and touch-up painting.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

May 25, 2011	P-2011.0103, Project 60871, Responsible Official and Address Change (A, but will become S upon issuance of this permit)
March 15, 2007	P-060452, Initial permit for a recreational vehicle (RV) manufacturing facility. Permit status (S)

Application Scope

This PTC is for a minor modification at an existing minor facility.

The applicant has proposed to install two additional trailer assembly lines.

Application Chronology

August 20, 2018	DEQ received an application and an application fee.
September 10-25, 2018	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
September 9, 2018	DEQ determined that the application was incomplete.
September 19, 2018	DEQ received supplemental information from the applicant.
September 28, 2018	DEQ determined that the application was complete.
October 11, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 19, 2018	DEQ made available the draft permit and statement of basis for applicant review.
November 12 –	
December 12, 2018	DEQ provided a public comment period on the proposed action.
November 13, 2018	DEQ received the permit processing fee.
December 18, 2018	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
PH1-P1H3 P2H1-P2H8	Fuel Burning Equipment <u>Building 1</u> (4) 0.58 MMBtu/hr heat input capacity natural gas heaters Manufacturer: ThermoCycler Model: GTC-480M <u>Building 2</u> (8) 0.95 MMBtu/hr heat input capacity natural gas heaters Manufacturer: Cambridge Engineering Inc. Model: S950	None	Building 1 doors, windows, and vents Building 2 doors, windows, and vents
EU-L1	<u>RV Assembly Line 1</u> Self-Constructed: 2011 Capacity: 32 Units/day	None	Building 1 doors, windows, and vents
EU-L2	<u>RV Assembly Line 2</u> Self-Constructed: 2019 Capacity: 30 Units/day	None	Building 2 doors, windows, and vents
EU-L3	<u>RV Assembly Line 3</u> Self-Constructed: 2019 Capacity: 30 Units/day	None	Building 2 doors, windows, and vents
EU-W1	<u>Woodworking Operations</u> Self-Constructed: 2011 Capacity: 15,000 lbs of wood/hour	<u>Dust Collector</u> Manufacturer: Donaldson Torit Year Manufactured: 2011 Model : 276RF10 PM efficiency: 99%	Building 1 doors, windows, and vents

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the heaters and assembly lines at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP PTE were based on emission factors from AP-42, operation of 8760 hours per year for assembly operations and 3950 hour operation for the heaters, and process information specific to the facility for this proposed project.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a “Synthetic Minor” source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this RV manufacturing operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr.

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources					
Assembly Line EU-L1	0.190	0.00	0.00	0.00	41.698
Assembly Line EU-L2	0.005	0.00	0.00	0.00	12.689
Assembly Line EU-L3	0.005	0.00	0.00	0.00	12.689
Cabinet and Molding Assembly	1.470	0.00	0.00	0.00	0.00
Existing Natural Gas Combustion Building 1	0.575	0.000	0.760	0.640	0.040
Proposed Natural Gas Combustion Building 2	0.060	0.009	1.472	1.236	0.081
Total	2.31	0.01	2.23	1.88	67.20

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this RV manufacturing operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr. Then, the worst-case maximum HAP Potential to Emit was determined for this RV manufacturing operation.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Arsenic	2.94E-06
Benzene	3.09E-05
Beryllium	1.77E-07
Cadmium	1.62E-05
Chromium	2.06E-05
Cobalt	1.24E-06
Formaldehyde	0.001
n-Hexane	0.026488
Manganese	5.59E-06
Mercury	3.83E-06
Nickel	3.09E-05
Selenium	3.53E-07
Naphthalene	8.98E-06
Xylene	11.89
Toluene	2.23
Cumene	1.29
Trimethyl Benzene	12.90
Ethyl Benzene	3.95
MEK	0.01
Total	32.27

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit from all emissions units is estimated using emission factors using the Statement of Basis (SOB) from P-060452, issued February 12, 2007.

Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Assembly Line EU-L1	0.146	0.19	0.000	0.000	0.000	0.000	0.000	0.000	32.075	41.698
Cabinet and Molding Assembly	1.131	1.47	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Existing Natural Gas Combustion Building 1	0.046	0.060	0.000	0.000	0.289	0.57	0.243	0.48	0.023	0.046
Pre-Project Totals	1.32	1.72	0.00	0.00	0.29	0.57	0.24	0.48	32.10	41.74

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Assembly Line EU-L1	0.146	0.19	0.000	0.000	0.000	0.000	0.000	0.000	32.075	41.698
Assembly Line EU-L2	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	2.831	3.68
Assembly Line EU-L3	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	2.831	3.68
Cabinet and Molding Assembly	1.131	1.47	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Existing Natural Gas Combustion Building 1	0.035	0.045	0.000	0.000	0.438	0.570	0.369	0.480	0.023	0.030
Proposed Natural Gas Combustion Building 2	0.065	0.084	0.005	0.007	0.849	1.104	0.715	0.930	0.047	0.061
Post Project Totals	1.38	1.79	0.01	0.01	1.29	1.67	1.08	1.41	37.81	49.15

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	1.32	1.72	0.00	0.00	0.29	0.57	0.24	0.48	32.10	41.74
Post Project Potential to Emit	1.38	1.79	0.01	0.01	1.29	1.67	1.08	1.41	37.81	49.15
Changes in Potential to Emit	0.06	0.07	0.01	0.01	1.00	1.10	0.84	0.93	5.71	7.41

TAP Emissions

A summary of the estimated PTE for emissions increase of toxic air pollutants (TAP) is provided in the following table.

Table 7 Pre- and Post Project Potential to Emit for Toxic Air Pollutants

Toxic Air Pollutants	Pre-Project Emissions Rates (lb/hr)	Post Project Emissions Rates (lb/hr)	Change in Emissions Rates (lb/hr)	Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Chromium	3.41E-07	1.01E-06	6.72E-07	1.5E-06	No
Cobalt	3.58E-06	1.06E-05	7.06E-06	8.0E-04	No
Dichlorobenzene	2.05E-08	6.08E-08	4.03E-08	2.8E-05	No
Formaldehyde	1.88E-06	5.58E-06	3.70E-06	3.7E-06	No
n-Hexane	2.39E-06	7.09E-06	4.70E-06	3.3E-02	No
Manganese	1.43E-07	4.25E-07	2.82E-07	3.3E-03	No
Mercury	0.00E+00	4.03E-06	4.03E-06	9.1E-05	No
Nickel	1.28E-04	3.80E-04	2.52E-04	5.1E-04	No
POM	2.51E-02	3.11E-02	6.05E-03	1.2E+01	No
Selenium	6.48E-07	1.92E-06	1.28E-06	6.7E-02	No
Toluene	4.44E-07	1.32E-06	8.74E-07	3.0E-03	No
2-Methylnaphthalene	3.58E-06	1.06E-05	7.06E-06	2.7E-05	No
3-Methylchloranthrene	1.94E-08	5.77E-08	3.83E-08	2.0E-06	No
Acenaphthene	4.09E-08	1.22E-07	8.06E-08	1.3E-02	No
Acenaphthylene	3.45E-01	9.95E-01	6.50E-01	2.5E+01	No
Anthracene	0.00E+00	8.06E-08	8.06E-08	9.1E-05	No
Benzo(g,h,i)perylene	0.00E+00	6.05E-09	6.05E-09	2.5E-06	No
Fluoranthene	0.00E+00	6.05E-09	6.05E-09	9.1E-05	No
Fluorene	0.00E+00	6.05E-09	6.05E-09	9.1E-05	No
Naphthalene	0.00E+00	8.06E-09	8.06E-09	9.1E-05	No
Phenanthrene	0.00E+00	4.03E-09	4.03E-09	9.1E-05	No
Pyrene	0.00E+00	1.01E-08	1.01E-08	9.1E-05	No
Xylene	2.189	3.92E+00	1.73E+00	2.9E+01	No
VM & P Naptha	0.00E+00	7.76E-03	7.76E-03	9.1E+01	No
Ethyl Acetate	0.00E+00	5.82E-03	5.82E-03	9.3E+01	No
n-butylacetate	0.00E+00	6.48E-03	6.48E-03	4.7E+01	No
Cumene	0.00E+00	1.88E-01	1.88E-01	1.6E+01	No
MEK	0.992	1.19E+00	1.96E-01	3.9E+01	No
Mineral Spirits	0.00E+00	4.55E-01	4.55E-01	1.7E+01	No
Trimethyl Benzene	0.00E+00	1.88E+00	1.88E+00	8.2E+00	No
Ethyl Benzene	0.015	5.92E-01	5.77E-01	2.9E+01	No
Isopropyl Alcohol	0.00E+00	4.55E-01	4.55E-01	6.5E+01	No
MIBK	0.00E+00	8.76E-04	8.76E-04	1.4E+01	No
Heptane	0.00E+00	1.62E-01	1.62E-01	1.1E+02	No
Acetone	0.00E+00	7.69E+00	7.69E+00	1.2E+02	No

1.) As documented in SOB for P-060452, issued February 12, 2007.

All changes in emissions rates for non-carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 8 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (lb/hr)	PTE (T/yr)
Arsenic	1.95E-07	8.54E-07
Benzene	2.05E-06	8.96E-06
Beryllium	1.17E-08	5.12E-08
Cadmium	1.07E-06	4.69E-06
Chromium	1.36E-06	5.97E-06
Cobalt	8.18E-08	3.58E-07
Formaldehyde	7.31E-05	3.20E-04
n-Hexane	0.002	7.68E-03
Manganese	3.70E-07	1.62E-06
Mercury	2.53E-07	1.11E-06
Nickel	2.05E-06	8.96E-06
Selenium	2.34E-08	1.02E-07
Naphthalene	5.94E-07	2.60E-06
Xylene	0.79	3.45E+00
Toluene	0.15	6.47E-01
Cumene	0.09	3.74E-01
Trimethyl Benzene	0.85	3.74E+00
Ethyl Benzene	0.26	1.15E+00
MEK	3.98E-04	1.74E-03
Totals	2.14	9.37

Ambient Air Quality Impact Analyses

As presented in the Modeling Memo in Appendix B, the estimated emission rates of PM₁₀, PM_{2.5}, SO₂, NO_x, CO, VOC, HAP, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline¹. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Twin Falls County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below

¹ Criteria pollutant thresholds in Table 2, State of Idaho Guideline for Performing Air Quality Impact Analyses, Doc ID AQ-011, September 2013.

applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.
- UNK = Class is unknown.

For All Other Pollutants:

- A = Use when permitted emissions of a pollutant are > 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.
- UNK = Class is unknown.

Table 9 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	2.31	1.75	100	B
PM ₁₀	2.31	1.75	100	B
PM _{2.5}	2.31	1.75	100	B
SO ₂	0.01	0.01	100	B
NO _x	2.23	1.14	100	B
CO	1.88	0.96	100	B
VOC	67.2	<95	100	B
HAP (single)	12.9	<10	10	SM
Total HAPs	32.3	<25	25	SM

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.5 and 4.4.

Standards for New Sources (IDAPA 58.01.01.676)

IDAPA 58.01.01.676 Standards for New Sources

The fuel burning equipment located at this facility, with a maximum rated input of ten (10) million BTU per hour or more, are subject to a particulate matter limitation of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gaseous fuels. Fuel-Burning Equipment is defined as any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. This requirement is assured by Permit Condition 2.4.

Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)

IDAPA 58.01.01.701 Particulate Matter – New Equipment Process Weight Limitations

IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment's process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

For equipment that commenced operation on or after October 1, 1979, the PM allowable emission rate (E) is based on one of the following two equations:

IDAPA 58.01.01.701.01.a: If PW is < 9,250 lb/hr; $E = 0.045 (PW)^{0.60}$

IDAPA 58.01.01.701.01.b: If PW is $\geq 9,250$ lb/hr; $E = 1.10 (PW)^{0.25}$

This requirement is assured by Permit Condition 4.3.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements in 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT/GACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and could be subject to the requirements of 40 CFR 63, Subpart HHHHHH.—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and *is ensured by Permit Conditions 3.15 through 3.19*. DEQ is delegated only for major sources for this subpart. DEQ is not authorized to exempt the facility from the requirements without a signed EPA exemption letter. The following is a breakdown of the subpart as it applies in this facility, until such time a signed EPA exemption letter is filed for the facility:

§63.11169 What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

- (a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;
- (b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray- applied surface coating operations;
- (c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

§63.11170 Am I subject to this subpart?

- (a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph
- (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair

the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(c) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

§63.11170(a) (2) allows Jayco Inc. to petition the Administrator for an exemption from this subpart if it can demonstrate, to the satisfaction of the Administrator, that the facility spray apply no coatings that contain the target HAP, as defined in §63.11180. Since Idaho is not delegated this subpart for minor sources, the Administrator is EPA. This exemption letter requirement prefaces each permit condition.

§63.11171 How do I know if my source is considered a new source or an existing source?

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007, by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

Jayco Inc. was constructed prior to September 17, 2007, and it was not reconstructed subsequent to that date. Therefore, it is an existing affected source.

§63.11172 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the

compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

§63.11173 What are my general requirements for complying with this subpart?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

Jayco Inc. does not perform paint stripping operations using MeCl. Therefore, §63.11173(a) through (d) is not applicable.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

Personnel who spray apply paints must be trained using a program that includes items listed in §63.11173(f). This is ensured by Permit Condition 3.15.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing

Particulate Matter, June 4, 1992” (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non- HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

98% filter removal efficiency requirement is in effect if no exemption letter is provided. This is ensured by Permit Condition 3.15.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

Jayco Inc. uses HVLP spray guns. This is ensured by Permit Condition 3.15.

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

Jayco Inc. cleans paint spray guns in a manner that collects solvent and paint residue in a container such that atomized mist of solvent and paint residues are not created outside of the container. This is ensured by Permit Condition 3.15.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you

permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

- (1) A list of all current personnel by name and job description who are required to be trained;
- (2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.
 - (i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - (iii) Routine spray booth and filter maintenance, including filter selection and installation.
 - (iv) Environmental compliance with the requirements of this subpart.

Personnel who spray apply paints must be trained using a program that includes items listed in §63.11173 (f)(1) through (2). This is ensured by Permit Condition 3.15.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

- (1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- (2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- (3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

§63.11174 What parts of the General Provisions apply to me?

- (a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.
- (b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart

applicable to area sources.

Jayco Inc. is an area source subject to this subpart. Therefore it is exempt from an obligation to obtain a Title V operating permit.

§63.11175 What notifications must I submit?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

- (1) The company name, if applicable.
- (2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
- (3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;
- (4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);
- (5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.
 - (i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
 - (ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).
- (6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.
- (7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.
- (8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the

information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

- (1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
- (2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).
- (3) The date of the Notification of Compliance Status.
- (4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

The notification requirements of §63.11175(a) (1) through (5)(i), (a)(1)(7) through (8) and (b)(1) through (3) are in effect if no exemption letter is provided. This is ensured by Permit Condition 3.17.

§63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

- (1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - (2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- (b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

The reporting requirements of §63.11176(a)(1) through (2) are in effect if no exemption letter is provided. This is ensured by Permit Condition 3.18.

§63.11177 What records must I keep?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

The recordkeeping requirements of §63.11177(a) through (b), (d) and (g) are in effect if no exemption letter is provided. This is ensured by Permit Condition 3.18.

§63.11178 In what form and for how long must I keep my records?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Records retention requirements specified in §63.11177 are in effect if no exemption letter is available. This is ensured by Permit Condition 3.18.

§63.11179 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

The provisions in §63.11179(a) through (b) for implementation and enforcement of this subpart are in effect if no exemption letter is provided. Permit condition 3.19 ensures that should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Section 1 - Scope

This section was updated to describe the current permitting action of modifying the PTC to install two additional trailer assembly lines, update the permit being replace, and update the regulated sources Table 1.1.

Section 2 – Natural Gas Heaters

This section is new to the permit resulting from the TAPs emissions of the new natural gas heaters. Safe levels of the carcinogenic TAP cadmium are assured with the annual restriction on natural gas combusted and the restriction to natural gas fuel only. Monthly records are required to demonstrate annual compliance.

Section 3 – RV Assembly Lines

Permit Conditions 3.1 to 3.3 were updated to include assembly lines L2 and L3. Permit Condition 3.6 RV throughput was increased from 32 RVs/day to 92 RVs/day. This regulating method is supported in the emission inventory and has been used for compliance in the recent past. Permit Conditions 3.15 through 3.19 incorporate the 40 CFR 63, Subpart HHHHHH requirements.

Section 4 – Woodworking Operations

The throughput limit was changed from 5000 lb/hr to 15,000 lb/hr in Permit Condition 4.5.

Section 5 – General Provisions

The General Provisions have been updated to current requirements.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there was a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

APPENDIX A – EMISSIONS INVENTORIES

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Jayco, Inc.
Address City IN Zip: 511 Hankins Road South, Kimberly, ID 83341
Permit No./Plt ID: P-2011.013, 083-00097
Prepared By: D&B Environmental Services, Inc.
Date: 11/5/2018

Emission Unit	Potential to Emit (tons/yr)						Total HAPs
	PM	PM10	SO ₂	NOx	VOC	CO	
Existing Assembly Line EU-L1	1.470	0.190	--	--	41.698	--	11.664
Assembly Line EU-L2	0.005	0.005	--	--	12.689	--	10.310
Assembly Line EU-L3	0.005	0.005	--	--	12.689	--	10.310
Cabinet and Molding Assembly	2.878	1.470	--	--	--	--	--
Existing Natural Gas Combustion	0.060	0.060	0.000	0.760	0.040	0.640	0.000
New Natural Gas Combustion	0.028	0.112	0.009	1.472	0.081	1.236	0.062
Total	2.975	1.842	0.009	2.232	67.197	1.876	32.345

*MEK was not included as a HAP

Emission Unit	Potential to Emit after Control (tons/yr)*						Total HAPs
	PM	PM10	SO ₂	NOx	VOC	CO	
Existing Assembly Line EU-L1	0.426	0.055	--	--	12.092	--	3.382
Assembly Line EU-L2	0.001	0.001	--	--	3.680	--	2.990
Assembly Line EU-L3	0.001	0.001	--	--	3.680	--	2.990
Cabinet and Molding Assembly	0.835	1.261	--	--	--	--	--
Existing Natural Gas Combustion	0.045	0.045	0.000	0.570	0.030	0.480	0.000
New Natural Gas Combustion	0.021	0.084	0.007	1.104	0.061	0.927	0.046
Total	0.903	1.448	0.007	1.674	19.543	1.407	9.408

* Controlled = 2,600 Annual Hours of Operation

*TAP Emissions Level (EL-lb/hr)
Existing TAP Emission Rates

Xylene 1330-20-7 29	Toluene 108-88-3 25	Dipropylene ether 34590-34-8 40	MDI 101-68-8 0.003	Vinyl acetate 108-05-4 NA	MEK 78-93-3 39.3	Mineral Spirits 67-56-1 17.3	Tetrahydrof uran 109-99- 9 39.3	Ethyl Benzene 100-41-4 29
2.189	0.345	0.046	0.005	0.041	0.992	0.000	0.000	0.015

TAP Emissions Level (EL-lb/hr)

Isopropyl alcohol 67-63-0 65.3	Hexane 110-54-3 12	MIBK 108-10-1 13.7	Heptane 142-82-5 109	Acetone 67-64-1 119	Stoddard Solvent 8052-41-3 35	Trimethyl benzene 25551-13-7 8.2	Cumene 98-82-8 16.3
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**Appendix A: Emission Calculations
PTE Summary**

Company Name: Jayco, Inc.
Address City IN Zip: 511 Hankins Road South, Kimberly, ID 83341
Permit No./Pit ID: P-2011.013, 083-00097
Prepared By: D&B Environmental Services, Inc.
Date: 11/5/2018

Existing TAP Emission Rates

0.000	0.022	0.000	0.000	0.000	0.000	0.000	0.000
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	Xylene 1330-20-7 29	Toluene 108-88-3 25	VM&P Naptha 8032-32-4 91.3	Ethyl acetate 141-78-6 93.3	n-Butyl acetate 123-86-4 47.3	MEK 78-93-3 39.3	Mineral Spirits 67-56-1 17.3	Tetrahydrofuran 109-99-9 9.3	Ethyl Benzene 100-41-4 29
TAP Emissions Level (EL-lb/hr)									
Modification Agrigated TAP Emission Rates	2.311	0.325	0.008	0.006	0.006	0.215	0.455	0.135	0.461

	Isopropyl alcohol 67-63-0 65.3	Hexane 110-54-3 12	MIBK 108-10-1 13.7	Heptane 142-82-5 109	Acetone 67-64-1 119	Stoddard Solvent 8052-41-3 35	Trimethyl benzene 25551-13-7 8.2	Cumene 98-82-8 16.3
TAP Emissions Level (EL-lb/hr)								
Modification Agrigated TAP Emission Rates	0.455	0.000	0.001	0.376	7.694	1.500	1.882	0.188

Company Name: Jayco, Inc.
Address City IN Zip: 551 Mainline Road South, Kimberly, IL 63341
Permit No/PIB ID: P-2011 013, 083-00687
Prepared by: C&B Environmental Services, Inc.
Date: 11/6/2018

Assessing Line Operations														Overall Status						
Material	Density (lb/cu ft)	Weight % Volume (100% = Original)	Weight % Volume (100% = Empty)	Weight % Volume (100% = Empty)	Volume % Volume (100% = Empty)	Volume % Volume (100% = Empty)	Cost per Unit (lb/cu ft)	Maximum (lb/cu ft)	Current (lb/cu ft)	Reported (lb/cu ft)	Planned (lb/cu ft per gallon of coating)	Planned (lb/cu ft per pound of powder per lb)	Planned (lb/cu ft per lb)	Planned (lb/cu ft per lb)	Planned (lb/cu ft per lb)	Planned (lb/cu ft per lb)	Planned (lb/cu ft per lb)	Planned (lb/cu ft per lb)	Planned (lb/cu ft per lb)	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Aluminum Oxide Resin	7.73	10.00%	0.0%	25.0%	0.0%	60.00%	0.1880	0.750	17.81	2.13	0.71	2.09	48.48	8.84	0.00	4.18	100%	Wetted	Manual Check	
Aluminum Oxide Resin	7.73	10.00%	0.0%	25.0%	0.0%	60.00%	0.1880	0.750	17.81	2.13	0.71	2.09	48.48	8.84	0.00	4.18	100%	Wetted	Manual Check	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000	0.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Quartz 100 (Silicon Resin)	10.00	0.00%	0.0%	0.0%	0.0%	0.0000														

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Bioshield Plant Operations																					
Material	Slurry % (lb/cy)	Waste % Volume (10% & Organics)	Waste % Volume & Leachate	Waste % Organics	Volume % Water & Leachate	Volume % Non- Volatiles (solids)	Gas of Air (lb/cy)	Maximum (lb/cy/ton)	Gallons Used (gallons)	Pounds VOC per gallon of leaching water	Pounds VOC per gallon of leachate	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC pounds per year	Incinerate (lb/cy/ton) (only)	Is OC/SL status	Transfer (lb/cy)	Substrate	Application		
BAEP AMOS	8.92	19.11%	8.71%	17.01%	12.1%	8.55%	0.0001	0.500	0.83	3.50	4.80	0.00	0.00	0.00	0.00	0.00	0.00	54.44	75%	Woolfaste	HAUP
BAEP AMOS	8.92	19.11%	8.71%	17.01%	12.1%	8.55%	0.0001	0.500	0.83	3.50	4.80	0.00	0.00	0.00	0.00	0.00	54.44	75%	Woolfaste	HAUP	
BAEP B21200	8.50	16.66%	22.00%	22.00%	29.21%	31.83%	0.0003	0.500	0.83	4.90	3.80	0.00	0.00	0.00	0.00	0.00	11.55	75%	Woolfaste	HAUP	
BAEP B21200	7.88	16.66%	0.00%	0.00%	6.5%	1.80%	0.0001	0.500	0.00	7.50	3.00	0.00	0.00	0.00	0.00	0.00	106.93	75%	Plastic	HAUP	
BAEP L4100	8.91	100.00%	10.00%	90.00%	10.00%	0.0003	0.500	0.60	8.88	8.88	2.28	0.00	0.00	0.00	0.00	0.00	155.93	75%	Plastic	HAUP	
Total Potential VOC															0.00		172.91				

Background Information

Material	Density (lb/cu ft)	Weight % Volatile Hydrocarbons (H/C)	Weight % Water & Extract	Weight % Gums	Volume % Water & Extract	Volume % Non-Volatiles (solids)	Grav of Sol (gph/lb)	Maximum (w/6000)	Gallons Used (gph/day)	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating	Pounds of VOC pounds per hour	Pounds of VOC pounds per year	Potential VOC base per year	Potentials Potential [poly]	WVOCs lbs/day	Transfer Efficiency	Substrate	Application Method
TD-01 100% Isocyanate Resin	8.79	100.00%	0.00%	100.00%	0.0%	0.00%	0.0001	3.750	0.21	100	8.79	0.08	1.41	0.28	0.00	100%	100%	Silver/Steel	Handspray
TD-02 Acrylic	8.69	100.00%	0.00%	0.00%	100.0%	0.00%	0.0001	3.750	0.21	100	8.69	0.05	0.80	0.00	0.00	100%	100%	Silver/Steel	Handspray
TD-03 Acrylic	8.69	100.00%	0.00%	0.00%	0.0%	0.00%	0.0001	3.750	0.21	100	8.69	0.14	2.00	0.00	0.00	100%	100%	Silver/Steel	Handspray
TD-04 Polyurethane	8.68	100.00%	0.00%	100.00%	0.0%	0.00%	0.0011	3.750	1.54	448	8.68	0.18	2.71	1.22	0.00	100%	100%	Silver/Steel	Handspray
TD-05 Polyurethane	8.68	100.00%	0.00%	0.00%	100.00%	0.00%	0.0001	3.750	0.20	0.00	8.68	0.00	0.00	0.00	0.00	100.00%	100%	Plastic	Handspray

Potential Limitations

Grand Totals EU-3	3 887	68 530	12 888	0 005
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Points of VOC per Gallon: Ceiling vs. Water = (Density (kg/m³) * Weight (kg) / (1000 Volume (m³))
 Points of VOC per Gallon: Ceiling = (Density (kg/m³) * Weight (kg) / (1000 Volume (m³))
 Points of VOC per Hour = (Volume of VOC per Gallon (kg/m³) * Gall (m³) / (Volume (m³))
 Points of VOC per Hour per Day = (Points of VOC per Gallon (kg/m³) * Gall (m³) / (Volume (m³)) * 24 (hours)
 Points of VOC per Ton per Year = (Points of VOC per Gallon (kg/m³) * Gall (m³) / (Volume (m³)) * 24 (hours) * 365 (days) * 1000 (kg/ton)
 Potential Maximum Hazard Area per Hour = (Volume of VOC per Gallon (kg/m³) * Gall (m³) / (Volume (m³)) * 24 (hours) * 365 (days) * 1000 (kg/ton) * 1000 (m³/m³)
 Points of VOC per Gallon of Solids = (Density (kg/m³) * Weight (kg) / (1000 Volume (m³))
 Note: Water Content = 0.01 (kg/m³) * 1000 (kg/ton) * 1000 (m³/m³)

**Appendix A: Emission Calculations
EU-L2 TAPs**

Company Name: Jayco, Inc.
Address City IN Zip: 511 Hankins Road South, Kimberly, ID 83341
Permit No./PII ID: P-2011.013, 083-00097
Prepared By: D&B Environmental Services, Inc.
Date: 11/5/2018

Assembly Line Operations

Material	Density (lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % VM & P Naphtha	Weight % Ethyl Acetate	Weight % n-butylacetate	Weight % Cumene	Weight % MEK	Weight % Methanol	Weight % Mineral Spirits	Weight % Tetrahydrofuran	Weight % Trimethylbenzene	Weight % Ethyl Benzene	Weight % Isopropyl Alcohol
Digast Silicone Sealant	8.67	0.0085	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hiniker Quad Sealant	7.73	0.1890	3.75	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Gascel 2300 Sealant	9.92	0.1265	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%
Dap 4000 Adhesive	10.84	0.1295	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%
Swift 49185 Adhesive	9.43	0.4165	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Cyrol C-33	5.42	0.0132	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Osley Adhesive	16.68	0.0028	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Touchup Paint Operation

Material	Density (lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % VM & P Naphtha	Weight % Ethyl Acetate	Weight % n-butylacetate	Weight % Cumene	Weight % MEK	Weight % Methanol	Weight % Mineral Spirits	Weight % Tetrahydrofuran	Weight % Trimethylbenzene	Weight % Ethyl Benzene	Weight % Isopropyl Alcohol
BASF AM800	8.90	0.0008	0.50	5.00%	15.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%
BASF NPL Base	8.83	0.0008	0.50	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%
BASF DC5135	7.58	0.0023	0.50	3.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%
BASF 352-500	7.60	0.0001	0.50	20.00%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%
BASF UH30	6.93	0.0028	0.50	0.00%	15.00%	40.00%	30.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Final Finish

Material	Density (lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % VM & P Naphtha	Weight % Ethyl Acetate	Weight % n-butylacetate	Weight % Cumene	Weight % MEK	Weight % Methanol	Weight % Mineral Spirits	Weight % Tetrahydrofuran	Weight % Trimethylbenzene	Weight % Ethyl Benzene	Weight % Isopropyl Alcohol
ICI DT-18	7.02	0.0106	3.75	0.00%	45.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ICI Acetone	6.59	0.0023	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ICI Isopropanol	6.59	0.0092	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
ICI Mineral Spirits	6.58	0.0092	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%
Makel Varnish Markers	11.18	0.0002	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

METHODOLOGY:

TAPs emission rate (pounds/hr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % TAP

Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	VW & P Napha Emissions	Ethyl Acetate Emissions	m-Butylacetate Emissions	Cumene Emissions	MEK Emissions
Hexane	MIBK	Heptane	Acetone	Standard Solvent	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	0.00%	15.00%	0.865	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.004	0.000
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	25.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	30.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	70.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Potential Emissions:					0.865	0.000	0.000	0.000	0.000	0.004	0.000

Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	VW & P Napha Emissions	Ethyl Acetate Emissions	m-Butylacetate Emissions	Cumene Emissions	MEK Emissions
Hexane	MIBK	Heptane	Acetone	Standard Solvent	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
0.00%	0.00%	0.00%	35.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	5.00%	5.00%	0.00%	0.00%	0.001	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	3.00%	3.00%	25.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	10.00%	0.00%	0.000	0.001	0.004	0.000	0.000	0.000	0.000
Potential Emissions:					0.002	0.002	0.004	0.000	0.000	0.000	0.000

Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	VW & P Napha Emissions	Ethyl Acetate Emissions	m-Butylacetate Emissions	Cumene Emissions	MEK Emissions
Hexane	MIBK	Heptane	Acetone	Standard Solvent	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
0.00%	0.00%	10.00%	20.00%	0.00%	0.000	0.161	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	100.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Potential TAP Emissions:					0.000	0.161	0.000	0.000	0.000	0.000	0.000
Total Potential TAP Emissions:					0.000	0.161	0.000	0.000	0.000	0.000	0.000
Total Potential HAP Emissions:					0.867	0.163	0.004	0.000	0.000	0.004	0.000
					3.797	0.713				0.412	

10.310

**Appendix A: Emission Calculations
VOC and Particulate
EQU 3**

Company Name: Jaysco, Inc.
Address City / IN Zip: 311 Hawkins Road South, Kimberly, ID 83341
Permit No./PI ID: P-001101A, 003-00007
Prepared By: DBB Environmental Services, Inc.
Date: 11/5/2018

Assembly Line Operations

Material	Density (lb/Gal)	Weight % Volatile (100 % Organic)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Gal of Mat (gal/min)	Maximum (min/hour)	Gallons Used (gal/day)	Pounds VOC per gallon of coating (lbs/lb)	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (pounds per year)	Particulate Potential (lb/yr)	% VOC by Weight	Transfer Efficiency	Substrate	Application Method
Orange 100 Acrylic Primer	10.91	0.00%	0.0%	0.0%	0.0%	100.00%	0.0005	3.750	0.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Paints	Manual Brush
Orange 200 Sealant	7.73	35.00%	0.0%	35.0%	0.0%	65.00%	0.1993	3.750	11.91	2.71	2.71	2.63	48.48	8.65	0.00	4.16	100%	Wood/Plastic	Manual Caulk
Orange 200 Sealant	9.82	60.0%	0.0%	60.0%	0.0%	40.00%	0.1265	3.750	11.19	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood/Plastic	Manual Caulk	
Gap 4000 Acrylics	10.34	2.12%	0.0%	2.1%	0.0%	97.88%	0.1265	3.750	11.19	0.23	0.23	0.11	2.58	0.47	0.00	0.73	100%	Wood/Plastic	Manual Caulk
Orbit 400 Acrylics	9.43	60.00%	0.0%	60.0%	0.0%	40.00%	0.1485	3.750	17.48	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood/Plastic	new electric spray	
Cyco C-33	9.42	92.00%	0.00%	92.00%	0.0%	8.00%	0.0132	3.750	1.19	4.98	4.98	0.25	5.97	1.06	0.00	1349.44	50%	Electrocoat	airless
Galaxy Clear Coat	10.68	0.00%	0.0%	0.0%	0.0%	100.00%	0.0006	3.750	0.23	0.00	0.00	0.00	0.00	0.00	0.00	100%	Paints	Manual Brush	
										Potential Emissions		0.87	58.88	19.65	0.00				

1. 100% QM has been used for application of BAP 4000 and BAP 4000 in HV assembly operations at this source when using non-solvent spray does not generate particulate emissions

Touchup Paint Operation

Material	Density (lb/Gal)	Weight % Solids (100 & Organic)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solid)	Gal of Mat (gal/min)	Maximum (min/hour)	Gallons Used (gal/day)	Pounds VOC per gallon of coating (lbs/lb)	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (pounds per year)	Particulate Potential (lb/yr)	% VOC by Weight	Transfer Efficiency	Substrate	Application Method	
BASF AEM-20	8.80	79.71%	8.25%	71.61%	19.9%	80.0%	0.0008	0.500	0.81	5.50	4.80	0.00	0.00	0.00	0.00	0.00	44.44	75%	Wood/Plastic	HVLP
BASF 1000 Primer	8.83	69.68%	0.00%	69.68%	0.0%	30.32%	0.0008	0.500	0.81	6.10	6.10	0.00	0.04	0.07	0.00	29.00	75%	Wood/Plastic	HVLP	
BASF 1000 Primer	9.50	68.20%	25.00%	43.20%	29.6%	70.40%	0.0007	0.500	0.81	4.90	4.90	0.00	0.10	0.22	0.00	11.55	75%	Wood/Plastic	HVLP	
BASF 350-500	7.60	88.68%	0.00%	88.68%	0.0%	11.32%	0.0001	0.500	0.00	7.50	7.50	0.00	0.01	0.00	0.00	199.87	75%	Plastic	HVLP	
BASF 1000	8.83	100.00%	0.00%	100.00%	0.0%	0.00%	0.0008	0.500	0.81	6.24	6.24	0.01	0.21	0.04	0.00	100.00	75%	Paints	HVLP	
										Potential Emissions		0.03	0.41	0.87	0.00					

Final Finish

Material	Density (lb/gal)	Weight % Volatile (100 & Organic)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solid)	Gal of Mat (gal/min)	Maximum (min/hour)	Gallons Used (gal/day)	Pounds VOC per gallon of coating (lbs/lb)	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (pounds per year)	Particulate Potential (lb/yr)	% VOC by weight	Transfer Efficiency	Substrate	Application Method
ICI 801 10 Acrylic Primer	8.79	100.00%	0.00%	100.00%	0.0%	0.00%	0.0003	3.750	0.21	N/A	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%	Electrocoat	Handspray
ICI Acrylics	8.69	100.00%	100.00%	0.00%	100.00%	0.00%	0.0003	3.750	0.21	N/A	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%	Electrocoat	Handspray
ICI Acrylics	8.65	100.00%	0.00%	100.00%	0.0%	0.00%	0.0003	3.750	0.83	6.55	6.55	0.23	5.42	9.89	0.00	N/A	100%	Electrocoat	Handspray	
ICI Mineral Spray	8.48	100.00%	0.00%	100.00%	0.0%	0.00%	0.0115	3.750	1.24	6.48	6.48	0.28	6.71	1.22	0.00	N/A	100%	Electrocoat	Handspray	
Orbit 400 Acrylics	11.18	0.00%	0.00%	0.00%	0.00%	100.00%	0.0002	3.750	0.02	0.00	0.00	0.00	0.00	0.00	0.00	100.00%	Paints	Handspray		
Potential Emissions										0.81	19.19	2.21	0.00							

Grand Totals EQU 3: 0.87 69.55 19.66 0.00

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics) / (1 - Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per hour = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/min) * Maximum (min/hour)

Potential VOC Pounds per Day = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/min) * Maximum (min/hour) * (24 hours)

Potential VOC Pounds per Year = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/min) * Maximum (min/hour) * (365 days) * (1000000 lbs)

Particulate Potential (lb/yr) = (Pounds per hour) * (hours per day) * (Weight % Volatile) * (Transfer efficiency) * (365 days) * (1000000 lbs)

Pounds VOC per Gallon of Solids = (Density (lb/gal) * Weight % Organics) / (Volume % water)

Total VOC Coating = Sum of all volatile used

Company Name: Jayco, Inc.
Address City IN Zip: 511 Hankins Road South, Kimberly, ID 83341
Permit No./PR ID: P-2011.013, 083-00097
Prepared By: D&B Environmental Services, Inc.
Date: 11/5/2018

Final Fuelish																				
Mileage	Density	Gallons of Gasoline (L/Gallon)	Mile/mm	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %
		(Gallons)	(mm/min)	Xylene	Thiophene	CH ₂ + C ₃ Hydrocarbons	Cumene	Benzene	Toluene	Xylene	Phenylacetone	Phenylpropane	Phenylbutane	Phenylpentane	Phenylhexane	Phenylheptane	Phenyloctane	Phenylnonane	Phenyldecane	Phenylundecane
10000 Miles	7.62	0.0138	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10000 Miles	7.62	0.0023	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10000 Miles	7.62	0.0009	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10000 Miles	7.62	0.0002	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10000 Miles	7.62	0.0002	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Various Materials	11.18	0.0002	3.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Potential TAP Emissions																			0.00%	0.181
Total Potential TAP Emissions:																			0.00%	0.183
Total Potential TAP Emissions:																			3.787	0.713

METHODOLOGY

TAPS emission rate (pounds/yr) = Density (lb/gal) * Gal of Material (gal/yr) * Maximum (un/ft³) * Weight % TAP

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/yr) * Maximum (un/ft³) * Weight % HAP³8760/2000

VM & P Hazard Emissions	Ethyl Acetate Emissions	Isopropyl Alcohol Emissions	Carbon Emissions	MEK Emissions	Methyl Solvent Emissions	Tetrahydrofuran Emissions	Trimethyl Benzene Emissions	Ethyl Benzene Emissions	Isopropyl Alcohol Emissions	Hexane Emissions	MEK Emissions	Heptane Emissions	Acetone Emissions	Stoddard Solvent Emissions
(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.227	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.227	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.227	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
0.000	0.000	0.000	0.000	0.000	0.227	0.000	0.000	0.000	0.227	0.000	0.000	0.000	0.128	0.000
0.004	0.003	0.003	0.004	0.004	0.227	0.000	0.041	0.268	0.227	0.000	0.000	0.001	0.047	0.000
	0.017						0.117	0.263		0.000	0.002			

Appendix A: Emission Calculations
Particulate Emissions from Cabinet and Molding Assembly

Company Name: Jayco, Inc.
Address City IN Zip: 511 Hankins Road South, Kimberly, ID 83341
Permit No./Plt ID: P-2011.013, 083-00097
Prepared By: D&B Environmental Services, Inc.
Date: 11/5/2018

Plant 2	Control ID	Airflow (acfm)	Grain Loading (gr/acfm)	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency (%)	Potential Emissions Before Control		Potential PM10 Emissions After Control		Potential Emissions After Control	
							(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
Miscellaneous Wood Cutting	DC-1	30,000	0.002	8.7	3,671.00	99.00%	65.70	287.77	0.32	1.38	0.66	2.88
							65.70	287.77	0.32	1.38	0.657	2.88

Note:

PM 2.5 emissions are not anticipated to be generated from this process.

PM10 Emission Factor from the SCDHEC BAQ 2013

Woodworking control devices are determined to be integral, therefore the Uncontrolled Emissions (Tons/Yr) on Summary sheet reflects Potential Emissions After Control

Methodology:

Uncontrolled Potential Emission(tons/yr) = [No. Units * Loading (grains/acft) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]

Controlled Potential Emission (tons/yr) = [No. Units * Loading (grains/acft) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Jayco, Inc.
Address City IN Zip: 511 Hankins Road South, Kimberly, ID 83341
Permit No./Plt ID: P-2011.013, 083-00097
Prepared By: D&B Environmental Services, Inc.
Date: 11/5/2018

Plant	Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Heat Input Capacity (MMBtu/hr)
Plant 2	Space Heaters	8	P2H1 - P2H8	0.950	7.60
	TOTALS				7.60

Existing

3 0.58 1.74

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr		
7.6	1020	29.4	9.3	36.2

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.028	0.112	0.112	0.009	1.472	0.081	1.236

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 4000 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.1E-05	1.8E-05	1.1E-03	0.026	5.0E-05	0.03

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.4E-06	1.6E-05	2.1E-05	5.6E-06	3.1E-05	8.1E-05
Methodology is the same as above.					Total HAPs	0.03
The five highest organic and metal HAPs emission factors are provided above.					Worst HAP	0.03
Additional HAPs emission factors are available in AP-42, Chapter 1.4.						

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,766	0.0	0.0
Summed Potential Emissions in tons/yr	1,766		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	1,776		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O

Potential Emission ton/yr x N2O GWP (298).

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

MEMORANDUM

DATE: October 18, 2018

TO: Tom Burnham, Permit Writer, Air Program

FROM: Darrin Mehr, Air Quality Analyst, Air Program

PROJECT: P-2011.0103 Project 62099 – Jayco, Inc. – Kimberly

SUBJECT: Demonstration of Compliance with IDAPA 58.01.01.203.02 (NAAQS) and 203.03 (TAPs) as it relates to air quality impact analyses – BRC Criteria Pollutant Modeling Exemption and Controlled TAPs Modeling Exemption

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Acronyms, Units, and Chemical Nomenclature

AAC	Acceptable Ambient Concentration of a non-carcinogenic TAP
AACC	Acceptable Ambient Concentration of a Carcinogenic TAP
Appendix W	40 CFR 51, Appendix W – Guideline on Air Quality Models
BPIP	Building Profile Input Program
BRC	Below Regulatory Concern
CFR	Code of Federal Regulations
CMAQ	Community Multi-Scale Air Quality modeling system
CO	Carbon Monoxide
D&B Environmental	D&B Environmental, Inc. (permittee's consultant)
DEQ	Idaho Department of Environmental Quality
EL	Emissions Screening Level of a TAP
EPA	United States Environmental Protection Agency
Idaho Air Rules	Rules for the Control of Air Pollution in Idaho, located in the Idaho Administrative Procedures Act 58.01.01
Jayco	Jayco, Inc. (permittee)
lb/hr	Pounds per hour
lb/yr	Pounds per year
NAAQS	National Ambient Air Quality Standards
NO ₂	Nitrogen Dioxide
NO _x	Oxides of Nitrogen
O ₃	Ozone
Pb	Lead
PM ₁₀	Particulate matter with an aerodynamic particle diameter less than or equal to a nominal 10 micrometers
PM _{2.5}	Particulate matter with an aerodynamic particle diameter less than or equal to a nominal 2.5 micrometers
ppb	parts per billion
PTC	Permit to Construct
PTE	Potential to Emit
RV	Recreational Vehicle
SIL	Significant Impact Level
SO ₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
VOCs	Volatile Organic Compounds
µg/m ³	Micrograms per cubic meter of air

1.0 Summary

Jayco, Inc. (Jayco) submitted a permit to construct (PTC) application to modify their existing facility's PTC on August 20, 2018. The project will add two new recreational vehicle (RV) assembly lines and increase the associated manufacturing process capabilities for woodworking with a new baghouse that discharges inside the manufacturing building. Eight natural gas-fired space heaters with a total heat input capacity of 7.6 million British thermal units per hour (MMBtu/hr) will be installed as part of this project. Jayco requested annual operation limits on proposed Lines 2 and 3 of 2,600 hours/year and a limitation of 3,950 hour/year at rated capacity on the operation of the proposed natural gas-fired space heaters, limiting potential criteria pollutants and TAPs.

Jayco, in coordination with their consultant, D&B Environmental Services, Inc., prepared the PTC application for this project, including information and analyses to demonstrate compliance with applicable National Ambient Air Quality Standards (NAAQS) and Toxic Air Pollutant (TAP) increments. The DEQ review of submitted data and analyses summarized by this memorandum addressed only the rules, policies, methods, and data pertaining to the air impact analyses used to demonstrate that estimated emissions associated with operation of the facility will not cause or significantly contribute to a violation of any applicable air quality standard. This review did not address/evaluate compliance with other rules or analyses not pertaining to the air impact analyses. Evaluation of emissions estimates was the responsibility of the DEQ permit writer and is addressed in the main body of the DEQ Statement of Basis, and emissions calculation methods were not evaluated in this modeling review memorandum.

Estimates of non-fugitive, facility-wide allowable emissions of all criteria pollutants except volatile organic compounds (VOCs) were below levels identified as Below Regulatory Concern (BRC) for permit applicability. For those pollutants with emissions below BRC, the project is exempt from demonstrating compliance National Ambient Air Quality Standards (NAAQS), as required by the Idaho Administrative Procedures Act 58.01.01.203.02 and 203.03 (Idaho Air Rules Section 203.02 and 203.03). Maximum predicted emissions of VOCs are well below the 100 ton/year threshold that triggers a more detailed assessment of ozone (O₃) impacts. This memorandum provides a summary of DEQ's review of the applicability determination exempting the project from the requirement to submit ambient air impact analyses with permit application.

Project-specific Toxic Air Pollutant (TAP) emissions did not qualify for a permit exemption, but analyses demonstrate that maximum predicted ambient impacts from increases in TAP emissions are below acceptable levels specified in Idaho Air Rules Section 585 and 586.

Table 1 presents key assumptions and results to be considered in the development of the permit.

DEQ's review of the submitted information and analyses satisfactorily concluded that issuance of a PTC for the proposed project does not require a demonstration of NAAQS compliance for any criteria pollutants except O₃, and VOC emissions are such that resulting changes in O₃ levels are inconsequential. Also, DEQ is satisfied that TAP impacts are below applicable increments. These conclusions are valid provided the key conditions in Table 1 are representative of facility design capacity or operations as limited by a federally enforceable permit condition. The DEQ permit writer should use Table 1 and other information presented in this memorandum to generate appropriate permit provisions/restrictions to assure the requirements of Appendix W are met regarding emissions representative of design capacity or permit allowable rates.

Table 1. KEY ASSUMPTIONS USED IN MODELING ANALYSES	
Criteria/Assumption/Result	Explanation/Consideration
General Emissions Rates Criteria air pollutant emissions rates used in the air permitting analyses, as listed in the permit application, must represent maximum potential or allowable emissions as given by design capacity, inherently limited by the nature of the process or configuration of the facility, or as limited by the issued permit for the specific pollutant and averaging period.	Compliance has not been demonstrated for emissions rates greater than those used in the application's emissions inventory. The project's final criteria air pollutant emissions rates must be equal to or less than the applicable BRC levels on a facility-wide basis.
TAP Emissions Sources TAP emissions sources, as constructed and operated, must be accurately represented by the analyses submitted with the PTC application.	TAPs emission rate increases attributed to this project listed in the project's final emission inventory must remain below applicable TAP screening emission level (EL) to qualify for an exclusion from project-specific modeling.
VOC Emissions The annual VOC emission increase for the project exceeds the BRC modeling exemption level of 4 tons per year.	Stationary source modeling is not required to demonstrate compliance with the ozone ambient standard for VOC emissions since emissions are below the 100 ton/year threshold triggering more extensive review.
Annual Operating Hours and Daily Production An annual operation limitation of 2,600 hours per year was used to quantify annual emissions for the project's manufacturing process. Proposed lines 2 and 3 were each limited to 3.5 recreational vehicle (RV) units per hour and unlimited daily at 24 hours per day for a total of 84 RV per day for each line. An operating limit of 3,950 hours per year at rated heat input capacity was used to quantify annual emissions of criteria pollutant and TAPs emissions for the eight new space heaters.	Criteria pollutant emissions (other than VOCs) qualified for facility-wide BRC exemptions using the 2,600 hours per year limitation on RV assembly lines 2 and 3 and an annual natural gas combustion limit on new heating units to 29.43 million cubic feet per year. Project-specific modeling is not required for controlled TAPs emissions that are below ELs. Daily and annual operating restrictions were applied to the project's potential 24-hour average and annual average TAPs emissions.

Summary of Submittals and Actions

- August 20, 2018: Jayco submitted an application for a PTC modification to the existing facility.
- September 10, 2018: DEQ declared the permit application incomplete.
- September 19, 2018: D&B Environmental submitted a revised electronic spreadsheet to DEQ via email, on behalf of Jayco, Inc.
- Subsequent to September 19, 2018: D&B Environmental and DEQ established a restriction on natural gas combustion for the eight proposed heaters to reduce potential formaldehyde emissions below the TAP screening emission rate limit to maintain the exemption from modeling for all TAPs emissions attributed to this project.

2.0 Background Information

Background information on the project and the air impact analyses was provided in the Modeling Analysis Report submitted with the application.

2.1 Air Impact Analyses Required for All Permits to Construct

Idaho Air Rules Sections 203.02 and 203.03:

No permit to construct shall be granted for a new or modified stationary source unless the applicant shows to the satisfaction of the Department all of the following:

02. NAAQS. *The stationary source or modification would not cause or significantly contribute to a violation of any ambient air quality standard.*

03. Toxic Air Pollutants. *Using the methods provided in Section 210, the emissions of toxic air pollutants from the stationary source or modification would not injure or unreasonably affect human or animal life or vegetation as required by Section 161. Compliance with all applicable toxic air pollutant carcinogenic increments and toxic air pollutant non-carcinogenic increments will also demonstrate preconstruction compliance with Section 161 with regards to the pollutants listed in Sections 585 and 586.*

Atmospheric dispersion modeling, using computerized simulations, is used to demonstrate compliance with both NAAQS and TAPs. Idaho Air Rules Section 202.02 states:

02. Estimates of Ambient Concentrations. *All estimates of ambient concentrations shall be based on the applicable air quality models, data bases, and other requirements specified in 40 CFR 51 Appendix W (Guideline on Air Quality Models).*

2.2 Significant Impact Level and Cumulative NAAQS Impact Analyses

The Significant Impact Level (SIL) analysis for a new facility or proposed modification to a facility involves modeling estimated criteria air pollutant emissions from the facility or modification to determine the potential impacts to ambient air. Air impact analyses are required by Idaho Air Rules to be conducted in accordance with methods outlined in 40 CFR 51, Appendix W (Guideline on Air Quality Models). Appendix W requires that facilities be modeled using emissions and operations representative of design capacity or as limited by a federally enforceable permit condition.

A facility or modification is considered to have a significant impact on air quality if maximum modeled impacts to ambient air exceed the established SIL listed in Idaho Air Rules Section 006 (referred to as a “significant contribution” in Idaho Air Rules) or as incorporated by reference as per Idaho Air Rules Section 107.03.b. Table 2 lists the applicable SILs.

If modeled maximum pollutant impacts to ambient air from the emissions sources associated with a new facility or modification exceed the SILs, then a cumulative NAAQS impact analysis is necessary to demonstrate compliance with NAAQS and Idaho Air Rules Section 203.02.

A cumulative NAAQS impact analysis for attainment area pollutants involves assessing ambient impacts (typically the design values consistent with the form of the standard) from facility-wide potential/allowable emissions, and emissions from any nearby co-contributing sources, and then adding a DEQ-approved background concentration value to the modeled result that is appropriate for the criteria pollutant/averaging-period at the facility location and the area of significant impact. The resulting pollutant concentrations in ambient air are then compared to the NAAQS listed in Table 2. Table 2 also

lists SILs and specifies the modeled design value that must be used for comparison to the NAAQS. NAAQS compliance is evaluated on a receptor-by-receptor basis for the modeling domain.

If the cumulative NAAQS impact analysis indicates a violation of the standard, the permit may not be issued if the proposed project has a significant contribution (exceeding the SIL) to the modeled violation. If project-specific impacts are below the SIL, then the project does not have a significant contribution to the specific violations.

Table 2. APPLICABLE REGULATORY LIMITS

Pollutant	Averaging Period	Significant Impact Levels ^a (µg/m ³) ^b	Regulatory Limit ^c (µg/m ³)	Modeled Design Value Used ^d
PM ₁₀ ^e	24-hour	5.0	150 ^f	Maximum 6 th highest ^g
PM _{2.5} ^h	24-hour	1.2	35 ⁱ	Mean of maximum 8 th highest ^j
	Annual	0.2	12 ^k	Mean of maximum 1 st highest ^l
Carbon monoxide (CO)	1-hour	2,000	40,000 ^m	Maximum 2 nd highest ⁿ
	8-hour	500	10,000 ^m	Maximum 2 nd highest ⁿ
Sulfur Dioxide (SO ₂)	1-hour	3 ppb ^o (7.8 µg/m ³)	75 ppb ^p (196 µg/m ³)	Mean of maximum 4 th highest ^q
	3-hour	25	1,300 ^m	Maximum 2 nd highest ⁿ
	24-hour	5	365 ^m	Maximum 2 nd highest ⁿ
	Annual	1.0	80 ^r	Maximum 1 st highest ⁿ
Nitrogen Dioxide (NO ₂)	1-hour	4 ppb (7.5 µg/m ³)	100 ppb ^s (188 µg/m ³)	Mean of maximum 8 th highest ^t
	Annual	1.0	100 ^r	Maximum 1 st highest ⁿ
Lead (Pb)	3-month ^u	NA	0.15 ^r	Maximum 1 st highest ⁿ
	Quarterly	NA	1.5 ^r	Maximum 1 st highest ⁿ
Ozone (O ₃)	8-hour	40 TPY VOC ^v	70 ppb ^w	Not typically modeled

- ^a Idaho Air Rules Section 006 (definition for significant contribution) or as incorporated by reference as per Idaho Air Rules Section 107.03.b.
- ^b Micrograms per cubic meter.
- ^c Incorporated into Idaho Air Rules by reference, as per Idaho Air Rules Section 107.
- ^d The maximum 1st highest modeled value is always used for the significant impact analysis unless indicated otherwise. Modeled design values are calculated for each ambient air receptor.
- ^e Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
- ^f Not to be exceeded more than once per year on average over 3 years.
- ^g Concentration at any modeled receptor when using five years of meteorological data.
- ^h Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.
- ⁱ 3-year mean of the upper 98th percentile of the annual distribution of 24-hour concentrations.
- ^j 5-year mean of the 8th highest modeled 24-hour concentrations at the modeled receptor for each year of meteorological data modeled. For the SIL analysis, the 5-year mean of the 1st highest modeled 24-hour impacts at the modeled receptor for each year.
- ^k 3-year mean of annual concentration.
- ^l 5-year mean of annual averages at the modeled receptor.
- ^m Not to be exceeded more than once per year.
- ⁿ Concentration at any modeled receptor.
- ^o Interim SIL established by EPA policy memorandum.
- ^p 3-year mean of the upper 99th percentile of the annual distribution of maximum daily 1-hour concentrations.
- ^q 5-year mean of the 4th highest daily 1-hour maximum modeled concentrations for each year of meteorological data modeled. For the significant impact analysis, the 5-year mean of 1st highest modeled 1-hour impacts for each year is used.
- ^r Not to be exceeded in any calendar year.
- ^s 3-year mean of the upper 98th percentile of the annual distribution of maximum daily 1-hour concentrations.
- ^t 5-year mean of the 8th highest daily 1-hour maximum modeled concentrations for each year of meteorological data modeled. For the significant impact analysis, the 5-year mean of maximum modeled 1-hour impacts for each year is used.
- ^u 3-month rolling average.
- ^v An annual emissions rate of 40 ton/year of VOCs is considered significant for O₃.
- ^w Annual 4th highest daily maximum 8-hour concentration averaged over three years.

2.3 Toxic Air Pollutant Analyses

Emissions of toxic substances are generally addressed by Idaho Air Rules Section 161:

Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.

Permitting requirements for toxic air pollutants (TAPs) from new or modified sources are specifically addressed by Idaho Air Rules Section 203.03 and require the applicant to demonstrate to the satisfaction of DEQ the following:

Using the methods provided in Section 210, the emissions of toxic air pollutants from the stationary source or modification would not injure or unreasonably affect human or animal life or vegetation as required by Section 161. Compliance with all applicable toxic air pollutant carcinogenic increments and toxic air pollutant non-carcinogenic increments will also demonstrate preconstruction compliance with Section 161 with regards to the pollutants listed in Sections 585 and 586.

Per Section 210, if the total project-wide emissions increase of any TAP associated with a new source or modification exceeds screening emission levels (ELs) of Idaho Air Rules Section 585 or 586, then the ambient impact of the emissions increase must be estimated. If ambient impacts are less than applicable Acceptable Ambient Concentrations (AACs) for non-carcinogens of Idaho Air Rules Section 585 and Acceptable Ambient Concentrations for Carcinogens (AACCs) of Idaho Air Rules Section 586, then compliance with TAP requirements has been demonstrated.

Idaho Air Rules Section 210.20 states that if TAP emissions from a specific source are regulated by the Department or EPA under 40 CFR 60, 61, or 63, then a TAP impact analysis under Section 210 is not required for that TAP.

3.0 Analytical Methods and Data

Project-specific ambient air impact analyses were not submitted with the permit application. DEQ's evaluation of modeling applicability and non-project-specific impact analyses were based on current DEQ guidance/policy and the project's emissions inventory.

3.1 Emission Source Data

Emission increases of criteria pollutants and TAPs resulting from the proposed project were estimated by Jayco for various applicable averaging periods. Emission rates used in these modeling applicability and modeling impact analyses should be reviewed by the DEQ permit writer and compared with those in the final emissions inventory.

3.1.1 Modeling Applicability and Modeled Criteria Pollutant Emissions Rates

If project-specific emission increases for criteria pollutants would qualify for a below regulatory concern (BRC) permit exemption as per Idaho Air Rules Section 221 if it were not for potential emissions of one or more pollutants exceeding the BRC threshold of 10 percent of emissions defined by Idaho Air Rules as significant, then a NAAQS compliance demonstration may not be required for those pollutants with

emissions below BRC levels. DEQ's regulatory interpretation policy of exemption provisions of Idaho Air Rules is that: "A DEQ NAAQS compliance assertion will not be made by the DEQ modeling group for specific criteria pollutants having a project emissions increase below BRC levels, provided the proposed project would have qualified for a Category I Exemption for BRC emissions quantities except for the emissions of another criteria pollutant."¹ The interpretation policy also states that the exemption criteria of uncontrolled potential to emit (PTE) not to exceed 100 ton/year (Idaho Air Rules Section 220.01.a.i) is not applicable when evaluating whether a NAAQS impact analyses is required. A permit will be issued limiting PTE below 100 ton/year, thereby negating the need to maintain calculated uncontrolled PTE under 100 ton/year. The BRC exemption cannot be used to exempt a project from a pollutant-specific NAAQS compliance demonstration in cases where a PTC is required for the action regardless of emissions quantities, such as the modification of an existing emissions or throughput limit.

A NAAQS compliance demonstration must be performed for pollutant increases that would not qualify for the BRC exemption from the requirement to demonstrate compliance with NAAQS. This project increases the daily throughput limit for woodworking materials and recreational vehicles so the project-specific incremental increase does not qualify for a BRC threshold modeling exemption.

Site-specific air impact modeling analyses may not be necessary for some pollutants, even where such emissions do not qualify for the BRC exemption. DEQ has developed modeling applicability thresholds, below which a site-specific modeling analysis is not required. DEQ generic air impact modeling analyses that were used to develop the modeling thresholds provide a conservative SIL analysis for projects with emissions below identified threshold levels. Project-specific modeling applicability thresholds are provided in the *Idaho Air Modeling Guideline*². These thresholds were based on assuring an ambient impact of less than the established SIL for specific pollutants and averaging periods.

If project-specific total emission rate increases of a pollutant are below Level I Modeling Applicability Thresholds, then project-specific air impact analyses are not necessary for permitting. Use of Level II Modeling Applicability Thresholds, which are considerably less conservative than Level I thresholds, is conditional, requiring DEQ approval. DEQ approval is based on dispersion-affecting characteristics of the emission sources such as stack height, stack gas exit velocity, stack gas temperature, distance from sources to ambient air, presence of elevated terrain, and potential exposure to sensitive public receptors.

Jayco's permit application contained a modeling report listing exemption from project-specific modeling for all criteria air pollutants based on Level I modeling applicability thresholds. Level I modeling thresholds are pollutant- and averaging period-specific. Level I modeling thresholds for CO, PM₁₀, and Pb are based on short term averaging periods only. Level I modeling thresholds for PM_{2.5}, SO₂, and NO_x are based on both short-term and annual averaging periods, and are applied independently to short term and annual averaging periods. The emission rate documentation listed in the permit application was limited to annual emission rates for the project and for facility-wide emissions. The application applied a Level I modeling exemption for 24-hour average PM_{2.5} emissions. The worst-case 24-hour average emission rate must be provided to evaluate whether the project's emissions are below the threshold. In lieu of the Level I modeling threshold exemption, DEQ applied a facility-wide BRC modeling exemption based on the post-project potential to emit listed in the September 19, 2018, revised emission inventory for the criteria pollutants. Except for VOC emissions, all pollutants were below the BRC levels and the project is exempt from the requirement to demonstrate compliance with NAAQS for those pollutants.

Table 3 provides a comparison between post-project facility-wide allowable emissions and BRC levels.

Table 3. NAAQS COMPLIANCE DEMONSTRATION APPLICABILITY ANALYSIS RESULTS			
Pollutant	Annual Allowable Emissions^a (tons/year)	BRC^b Level (tons/year)	Project Exempted from Modeling Compliance Demonstration
PM _{2.5} ^c	0.73	1.0	Yes
PM ₁₀ ^d	0.73	1.5	Yes
NO _x ^e	1.7	4	Yes
CO ^f	1.4	10	Yes
SO ₂ ^g	0.01	4	Yes
Pb ^h	7.4E-06	0.06	Yes
VOCs ⁱ	19.5	4	No ^j

^a As stated in the application materials.

^b Below Regulatory Concern.

^c Particulate matter with a mean aerodynamic diameter of 2.5 microns or less.

^d Particulate matter with a mean aerodynamic diameter of 10 microns or less.

^e Nitrogen oxides.

^f Carbon monoxide.

^g Sulfur dioxide.

^h Lead.

ⁱ Volatile Organic Compounds.

^j Modeling is not exempted per the BRC threshold, but modeling for this pollutant is not required at this level of VOCs emissions.

Ozone (O₃) differs from other criteria pollutants in that it is not typically emitted directly into the atmosphere. O₃ is formed in the atmosphere through reactions of VOCs, NO_x, and sunlight. Atmospheric dispersion models used in stationary source air permitting analyses cannot be used to estimate O₃ impacts resulting from VOC and NO_x emissions from an industrial facility. O₃ concentrations resulting from area-wide emissions are predicted by using more complex airshed models such as the Community Multi-Scale Air Quality (CMAQ) modeling system. Use of the CMAQ model is very resource intensive and DEQ asserts that performing a CMAQ analysis for a particular permit application is not typically a reasonable or necessary requirement for air quality permitting. Addressing secondary formation of O₃ within the context of permitting a new stationary source has been somewhat addressed in EPA regulation and policy. As stated in a letter from Gina McCarthy of EPA to Robert Ukeiley, acting on behalf of the Sierra Club (letter from Gina McCarthy, Assistant Administrator, United States Environmental Protection Agency, to Robert Ukeiley, January 4, 2012):

... footnote 1 to sections 51.166(I)(5)(I) of the EPA's regulations says the following: "No de minimis air quality level is provided for ozone. However, any net emission increase of 100 tons per year or more of volatile organic compounds or nitrogen oxides subject to PSD would be required to perform an ambient impact analysis, including the gathering of air quality data."

The EPA believes it unlikely a source emitting below these levels would contribute to such a violation of the 8-hour ozone NAAQS, but consultation with an EPA Regional Office should still be conducted in accordance with section 5.2.1.c. of Appendix W when reviewing an application for sources with emissions of these ozone precursors below 100 TPY."

DEQ determined it was not appropriate or necessary to require a quantitative source specific O₃ impact analysis because allowable emissions estimates of VOCs and NO_x are below the 100 tons/year threshold.

Secondary Particulate Formation

The impact from secondary particulate formation resulting from emissions of NO_x, SO₂, and/or VOCs was assumed by DEQ to be negligible based on the magnitude of emissions and the short distance from emissions sources to locations where maximum PM₁₀ and PM_{2.5} impacts are anticipated.

3.1.2 Toxic Air Pollutant Emissions Rates

TAP emission regulations under Idaho Air Rules Section 210 are only applicable to new or modified sources constructed after July 1, 1995. Compliance with Idaho Air Rules Section 210 for TAPs was demonstrated using Section 210.08 *Controlled Ambient Concentration*. TAP ELs included in Idaho Air Rules Section 585 and 586 were derived from generic dispersion modeling analyses that DEQ determined would over predict impacts for most projects. Therefore, if the sum of controlled allowable TAP emissions from new and modified sources is less than ELs, then resulting ambient TAP concentrations are assured to be below associated AACs or AACCs and site-specific impact modeling is not necessary. Also, certain TAPs are addressed by a federal New Source Performance Standard per 40 CFR 60 or a National Emission Standard for Hazardous Air Pollutants per 40 CFR 63 and can be excluded from project-specific TAP analyses.

Controlled emissions for all TAPs resulting from the project were below ELs, thereby demonstrating that controlled ambient concentrations will remain below applicable AACs and AACCs. The emission rates provided to the modeling group by the project's permit writer reflected production and natural gas combustion limitations for the proposed project. Only cadmium and formaldehyde emissions were close to the ELs at 100% and 49% of the ELs, respectively. Natural gas combustion emissions of cadmium were limited to the EL by applying a 3,950 hours per year operating limit for the 7.6 MMBtu/hr capacity of space heaters that will be installed for the project. These parameters provide an effective limit of 29.4 million standard cubic feet of natural gas per year (MMscf/yr).

4.0 Conclusions

The information submitted with the PTC application demonstrated to DEQ's satisfaction that applicable emissions resulting from the Jayco facility will not cause or significantly contribute to a violation of any ambient air quality standard or TAP increment.

References

1. *State of Idaho Guideline for Performing Air Quality Impact Analyses*. Idaho Department of Environmental Quality. September 2013. State of Idaho DEQ Air Doc. ID AQ-011. Available at <http://www.deq.idaho.gov/media/1029/modeling-guideline.pdf>.
2. Policy Memorandum titled “*Policy on NAAQS compliance demonstration requirements of IDAPA 58.01.01.203.02 and 01.403.02*” Floyd, Tiffany, Administrator, Air Quality Division, Department of Environmental Quality, June 10, 2014.

APPENDIX C – FACILITY DRAFT COMMENTS

The following comments were received from the facility on November 2, 2018:

Facility Comment: We have comments regarding the 40 CFR 63, Subpart HHHHHH Requirements listed in conditions 3.15 through 3.19. Jayco Inc. conducts the manufacture of original recreational travel trailers at this location. Production painting is not conducted at this location. Aftermarket paint repair is also not conducted at this location. No paint stripping with methylene chloride is conducted at this location. The only painting conducted at this location is for the repair of pre-painted surfaces that are scratched or damaged during the assembly process. This touch-up coating is applied to assembled travel trailers and is conducted on-line during the assembly process. No metallic HAPs listed in Subpart HHHHHH are contained in the coatings used at this location. We feel that this operation is exempt from the requirements of 40 CFR 63, Subpart HHHHHH. Attached is a copy of the Petition for Exemption from this Area Source Rule for this site. There is no clear knowledge as to the timeline for US EPA to respond to this Petition for Exemption. Based on this position, we request that surface coating operations at this location be limited to below the applicability thresholds of Subpart HHHHHH. In accordance with the Subpart, and the definition of "spray-applied coating operations" contained in 40 CFR 63.11180, Jayco will restrict all touch-up coating application to hand-held aerosol cans, or hand-held devices (e.g., spray guns) with a paint cup capacity of 3 fluid ounces or less. These application processes will be sufficient to meet our touch-up needs and are not considered spray-applied coatings under the rule. Please modify this Draft Permit to Construct to remove the requirements of 40 CFR 63, Subpart HHHHHH contained in conditions 3.15 through 3.19.

DEQ Response: Idaho is only delegated the NESHAP 6H subpart for major sources. This means, as a minor source, you must petition the Administrator, in this case, EPA Region 10, for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you apply no spray coatings containing the target HAPs. From the October 2018 submittal to EPA to petition for 6H exemption, emailed to DEQ on November 2, 2018, it is apparent that the exemption process has been initiated but not completed. However, once the EPA has granted the 6H exemption, the letter can be presented to DEQ compliance staff to verify that the facility is exempt from the 40 CFR 63, Subpart HHHHHH Requirements listed in conditions 3.15 through 3.19. Therefore, Permit Conditions 3.15 through 3.19 will remain in the permit.

APPENDIX D – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Jayco Inc (Plant #2)
Address: 511 Hankins Road South
City: Kimberly
State: Idaho
Zip Code: 83341
Facility Contact: Ted Buchanan
Title: Director Safety & Environmental
AIRS No.: 083-00097

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	1.1	0	1.1
SO ₂	0.0	0	0.0
CO	0.9	0	0.9
PM10	0.1	0	0.1
VOC	7.4	0	7.4
Total:	0.0	0	9.5
Fee Due	\$ 2,500.00		

Comments: